

Docket No.: 60468.300301

Patent

**REMARKS**

The Examiner is thanked for the comments in the Action. They have helped us considerably in understanding his rationale therein and in drafting this Response thereto.

It is our understanding that claims 1-41 remain pending in this application, wherein claims 18-19 have been amended for reasons specifically remarked upon, below.

**Preliminary item:**

We note that a Petition for Accelerated Examination for this case was granted on 12/10/2003, and we request that further prosecution of this case proceed accordingly.

**Items 1, 3, and 9-10:**

These appear informational in nature and are understood to require no reply.

**Item 2 (Claim Objections):**

Claims 18-19 are objected to because of informalities. Responsive hereto, Claims 18-19 are amended. No new subject matter is added by these amendments.

**Items 4 (§ 102(b) rejections) and 6-7 (§ 103(a) rejections):**

These items are exactly the same as items 3 and 5-6 of the previous Action. We respectfully ask reconsideration of the remarks in our previous Response, and we add additional remarks on these items when discussing item 8 (Response to Arguments) of this Action.

**Item 5 (Inventorship and claim ownership):**

The Examiner correctly presumes that the subject matter of all of the claims was commonly owned at the time of invention.

**Item 8 (Response to Arguments):**

We thank the Examiner for considering our prior remarks and we regret that they were not found persuasive. Respectfully, we urge that the rejections are still error.

The Action here states "... *the law of anticipation requires that a distinction be made between the invention described or taught and the invention claimed. It does not require that the*

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reference "teach" what the subject patent teaches." Confusion was apparently caused in our previous remarks when we stated "[A distinction in the inventions] can be more easily seen by comparing Baru's Fig. 2 (page 5) and Applicant's Fig. 1." Our intent was to point out how the respective inventions are markedly different, not to argue that Fig. 1 supplants claim 1.

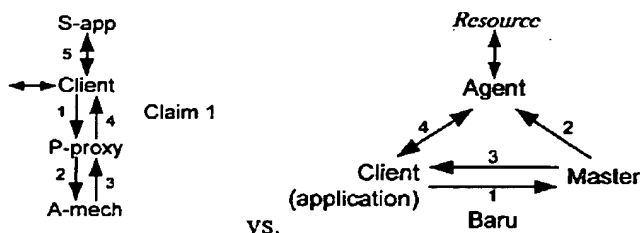
With respect to claims 1-15 and 22-35 that are rejected as being anticipated by Baru, please consider the following points:

Claim 1 recites "*a client ... for authenticating the subject to other components of the system by providing client credentials*" wherein one such other component is "*a protocol proxy for communicating between said client and [an] authentication mechanism and for authenticating said client based on said client credentials, for obtaining from the authentication mechanism temporary credentials ..., and for creating from said temporary credentials an authentication name assertion allowing said client to access the server application.*"

Accordingly, leaving out the subject which only communicates with the client, the path here is: client -- protocol proxy -- authentication mechanism -- protocol proxy -- client -- server application. Notably, the client never directly communicates with the authentication mechanism and the authentication mechanism never directly communicates with the server application.

Baru does not teach or reasonably suggest this. In it a client connects and authenticates to a SRB Master (a first leg of a triangular communication path), the SRB Master then "forks" a SRB Agent (a second leg) to delegate it to service the client when accessed by a connection handle, and the SRB Master then provides the connection handle to the client (the first leg now in reverse), and the client communicates thereafter with the SRB Agent (a third leg). Notably, the client here directly communicates with the SRB Master and the SRB Master here directly communicates with the SRB Agent.

In summary, for independent claim 1 and dependent claims 2-21 we have text stating what can be pictorially depicted with numbered steps as:

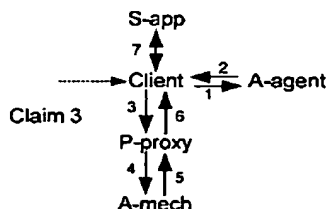


And a similar rationale applies for independent claim 22, and its dependent claims 23-41.

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As a point of clarification, when discussing the claimed application previously we noted that it “*employs a communications path [for authentication] shaped like the letter “T” rotated 90 degrees counter-clockwise (i.e., like this special character ⊥).*” This discussion was motivated by our suspicion that the Examiner was equating the SRB agent of Baru to the Applicant’s authentication agent, introduced in claims 3 and 24 and that use that shape of path.



Continuing further along, the Action states “*Baru teaches .... For example, client communicates with other components like SRB server [SIC] for authentication [Fig. 2 and Sec. 3 on Page 5].*” Yes, in Baru the client authenticates to the SRB Master. In Applicant’s claim 1 the client could conceivably authenticate directly with the authentication mechanism (bypassing the protocol proxy) but that would not provide the client with “*an authentication name assertion allowing [it] to access the server application.*”

Continuing, the Action next states “*In addition, Baru further teaches a {1} protocol proxy for {2} communicating between said client and the authentication mechanism and for {3} authenticating said client based on said client credentials, for {4} obtaining from the authentication mechanism temporary credentials for said client to access the server application, and for {5} creating from said temporary credentials an authentication name assertion allowing said client to access the server application. For example, {6} proxy operations for communication between client and SRB agent as authentication mechanism [see Secs. 2.8-2.10 on Page 4 and Sec. 3 on Page 5].* (numbering added) Respectfully, every one of the numbered statements is incorrect.

Regarding statement 1, in the cited portions, specifically section 2.8, Baru merely states “*The SRB provides several data handling operations ... without involving the client .... Such operations are referred to as proxy operations.*” Baru is clearly speaking here of its invention as a whole, not merely its SRB master or SRB agent. In context, this is not analogous to Applicant’s protocol proxy, and even overlooking the functional differences of the respective “proxies” as recited, Applicant’s client is considerably “involved” with the protocol proxy.

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Regarding statement 2, the error here should be clear from the above, with Baru even outright stating that its proxy operations are provide without involving its client.

Regarding statement 3, Baru clearly states that its proxy operations are merely for simple data handling ("*move and copy ... to move data directly from a source to a target*" id.).

Regarding statement 4, Baru states "*The SRB Master forks a SRB Agent to service the authenticated connection and returns the connection handle to the client.*" As is well known in the art, "credential" and "connection handle" are terms of art having quite different meanings.

Regarding statement 5, this cannot be reconciled with statement 4. In Baru nothing like the connection handle is converted to anything like a name assertion. A "name assertion" is also a term of art, and one also having a quite different meaning than "connection handle."

Regarding statement 6, this cannot be reconciled with many assertions made in the Action. Just what is the protocol proxy in Baru? What is it in Baru that lies between the client and the authentication mechanism?

With respect to claims 16-21 and 36-41 that are rejected as being obvious over Baru in view of other art, we maintain that Baru does not provide what it has been relied upon for to support the rejection, and that because of this no combination of Baru with the other art ("admitted prior art" or Hele) can teach or reasonably suggest the claimed invention.

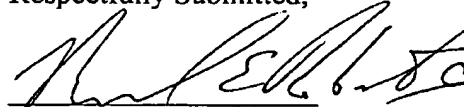
### CONCLUSION

Applicant has endeavored to put this case into complete condition for allowance. It is thought that the objections have been corrected by amendment, that the §102 rejections are shown to be unfounded on the prior art references cited, and that the §103 rejections have been completely rebutted. Applicant therefore asks that all objections and rejections now be withdrawn and that allowance of all claims presently in the case be granted.

Intellectual Property Law Offices  
1901 S. Bascom Ave., Suite 660  
Campbell, CA 95008

Telephone: 408.558.9950  
Facsimile: 408.558.9960  
E-mail: RRoberts@iplo.com

Respectfully Submitted,



Raymond E. Roberts  
Reg. No.: 38,597

Customer No. 32112